

**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)
CONSTRUCTION AIR CONTAMINANT DISCHARGE PERMIT**

1010 Main Street
Springfield, OR 97477
Telephone (541) 736-1056

Issued in accordance with the provisions of ORS 468A.040
and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Kingsford Manufacturing Company
3315 Marcola Road
Springfield, Oregon 97478

INFORMATION RELIED UPON:

Application Number: 63946
Received: April 5, 2018

PLANT SITE LOCATION:

3315 Marcola Road
Springfield, Oregon 97478

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield
Dated: July 1, 1999

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

Date

Nature of Business

Charcoal Manufacturing

SIC

2861

NAICS

325191

RESPONSIBLE OFFICIAL

Title: Plant Manager

FACILITY CONTACT PERSON

Name: Karen Chavez
Title: Plant Engineer
Phone: (541) 744-4558

DRAFT

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit	NO _x	Nitrogen oxides
Act	Federal Clean Air Act	O ₂	Oxygen
ASTM	American Society of Testing and Materials	OAR	Oregon Administrative Rules
Btu	British thermal unit	ODEQ	Oregon Department of Environmental Quality
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
CI	Compression Ignition	O&M	Operation and maintenance
CO	Carbon Monoxide	Pb	Lead
CO ₂	Carbon dioxide	PCD	Pollution Control Device
CO ₂ e	Carbon dioxide equivalent	PM	Particulate matter
CPMS	Continuous parameter monitoring system	PM _{2.5}	Particulate matter less than 2.5 microns in size
DEQ	Department of Environmental Quality	PM ₁₀	Particulate matter less than 10 microns in size
dscf	Dry standard cubic feet	ppm	Parts per million
EF	Emission factor	PSEL	Plant Site Emission Limit
EPA	US Environmental Protection Agency	psia	pounds per square inch, actual
EU	Emissions Unit	RICE	Reciprocating Internal Combustion Engine
FCAA	Federal Clean Air Act	SCEMP	Surrogate Compliance Emissions Monitoring Parameter
FSA	Fuel sampling and analysis	SERP	Source emissions reduction plan
GHG	Greenhouse Gas	SI	Spark Ignition
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SO ₂	Sulfur dioxide
HAP	Hazardous Air Pollutant as defined by LRAPA Title 12	ST	Source test
HCFC	Halogenated Chloro-Fluoro-Carbons	VE	Visible emissions
ID	Identification number or label	VMT	Vehicle miles traveled
I&M	Inspection and maintenance	VOC	Volatile organic compounds
LRAPA	Lane Regional Air Protection Agency		
MM	Million		
NA	Not applicable		

DEFINITIONS

Modified EPA Method 9: As used in this permit “Modified EPA Method 9” is defined as follows:

Opacity must be measured in accordance with EPA Method 9. For all standards, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. [See also the definition of “Opacity” in LRAPA Title 12]

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to change the method of operation to increase emissions above previously-permitted PSELs by increasing EU03 burner usage and char production. This Construction ACDP does not authorize operation of the modified facility. The permittee must ensure that their Title V Operating Permit allows, and covers, operation of the modified facility prior to start-up. [OAR 340-218-0010, 340-218-0120(2), and LRAPA 37-0052]

The change in the method of operation must be in accordance with plans submitted by the permittee, and must be able to comply with the emission limits, monitoring, recordkeeping and reporting requirements within this permit.

The change in the method of operation of the modified source must commence within 18 months of issuance of this permit. If the change in the method of operation does not commence within 18 months, this permit is void and future construction approval will have to be issued before construction can begin.

Notwithstanding the paragraph above, in the event that the Oregon Administrative Rules and/or LRAPA Rules are revised to allow for construction extensions, the permittee may request construction extensions in accordance with such rules.

This Construction ACDP does not prohibit the permittee from continuing to operate under their existing Title V operating permit (No. 204402). The existing Title V permit may need to be modified to allow operation of the modified facility if applicable requirements, emission limits, monitoring, recordkeeping, testing, or reporting requirements change.

2. All conditions of the existing Title V permit are included in this Construction ACDP to allow conversion to a Title V operating permit through the Administrative Amendment process.
3. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA, and citizens under the Clean Air Act, except as specified below:
 - 3.a. Conditions 6, 8, 10.a, 65.b.iv, G5, G6, and G9 (LRAPA Title 43 - Asbestos) are only enforceable by the LRAPA. [OAR 340-218-0060]

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

4. The emissions units regulated by this permit are the following [OAR 340-218-0040(3)]:

Table 1: Emission Units and Pollution Control Device (PCD) Identification

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Wood Receipt and Storage	EU01	Truck Dump Enclosure and Dust Collector	NA
Hogfuel Sizing and Infeed System	EU02	NA	NA
Charring and Drying System:	EU03		
Wood Fuel Drying System		After Combustion Chamber	03-01C
Charcoal Manufacturing		After Combustion Chamber	03-01C
Briquet Dryers		NA	NA
ACC Startup Burner Emissions		NA	NA

Briquet Cooling	EU04	NA	NA
Briquet Handling System:	EU08		
Briquetting		Wet Dust Collector (Wet Scrubber)	08-26C
Briquet Conveying		Small Vokes Dust Collector	08-27C
		West Dust Collector	08-29C
		East Dust Collector	08-30C
Briquet Packaging		North Package Bin Vent Dust Collector	08-41C
		South Package Bin Vent Dust Collector	08-42C
Combustion Unit (3.5 MMBtu Natural gas-fired boiler)	EU10	NA	NA
Solvent Treated Briquet (STB) Operation	EU11	ACC	03-01C
		West Dust Collector	08-29C
Aggregate Insignificant Activities (AIA)	EUAIA	See Emission Details	NA

ALTERNATIVE OPERATING SCENARIOS

5. In addition to the base operating scenario defined in Condition 4, the permittee may also operate under the following two (2) alternative operating scenarios: [OAR 340-218-0140(1)]
 - 5.a. EU03-1 ACC Shutdown Briquet Dryer Emissions - When the retort furnace and wood dryer systems in EU03 are shut down and no char is being produced, the source may operate an auxiliary natural gas burner to provide heat to the briquet dryers. [OAR 340-218-0050(8)(a)]
 - 5.b. EU03-2 ACC Burner Startup, Planned Shutdown, Scheduled Maintenance, or Malfunction Emissions - During retort furnace and wood dryer startups, when no char is being produced, the source may operate natural gas burners in the ACC to maintain minimum ACC combustion temperatures. [OAR 218-0050(8)(a)]
 - 5.c. The permittee must contemporaneously record changes from one alternative operating scenario to another. The record must be made available or submitted upon request by the LRAPA. [OAR 340-218-0140(1)(c)]

GENERAL EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

Table 2: Facility-wide Requirements

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Condition
48-015	6	Fugitive emissions	Minimize	7
49-010	8	Nuisance	No nuisance	10
32-055	9	PM >250 μ	No fallout	10
40 CFR Part 68	11	Risk management	Risk management plan	11

6. Applicable Requirement: The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but not be limited to the following: [LRAPA 48-015(1)] This condition is only enforceable by LRAPA.
- 6.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - 6.b. Application of asphalt¹, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
 - 6.c. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
 - 6.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - 6.e. Adequate containment during sandblasting or other similar operations; and
 - 6.f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.
 - 6.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
7. Monitoring Requirement: At least once each month for a minimum period of 30 minutes, the permittee must visually survey the plant for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the general location on the plant site of the source from which the visible emissions originate. The person conducting the observation does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If sources of visible emissions are identified, the permittee must: [OAR 340-218-0050(3)(a)]
- 7.a. immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 6; or
 - 7.b. conduct a Modified EPA Method 9 (see page 2 of the permit) test within 24 hours;
 - 7.c. Recordkeeping: The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any Modified EPA Method 9 tests.

¹ Although specified in the rules, LRAPA discourages the use of asphalt and oil as dust suppressants because of the negative environmental impact on other media.

Nuisance Conditions

- 8. Applicable Requirement: The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010(1)] This condition is enforceable only by LRAPA.
- 9. Applicable Requirement: The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [LRAPA 32-055]
- 10. Monitoring Requirement: The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility.
 - 10.a. Recordkeeping: Documentation required by Condition 10 must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible but no later than 5 business days. This condition is only enforceable by LRAPA. [OAR 340-218-0050(3)(a)]

Accidental Release Prevention

- 11. Applicable Requirement: Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

INDIVIDUAL EMISSION-UNIT-SPECIFIC EMISSION LIMITS AND STANDARDS

Table 3. Emissions Unit EU01, EU02, and EU10 Specific Emission Limits and Standards

Emissions Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
EU01	32-010(2),(3)	12	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	14
EU02	32-010(2),(3)	12	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	14
EU10	32-010(2),(3)	12	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	14
	32-030	13	PM	0.1 gr/dscf adjusted to 50% excess air or calculated to 12% CO2	Periodic VE Observations	NA

- 12. Applicable Requirement. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from EU01, EU02 and EU10 for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water

vapor. [LRAPA 32-010(2),(3)]

13. **Applicable Requirement.** The permittee shall not cause or allow the emission of particulate matter from EU10 in excess of 0.1 grains per dry standard cubic foot of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon monoxide. [LRAPA 32-030]
14. **Monitoring Requirement.** At least monthly for EU01, and at least quarterly for EU02 and EU10, for a minimum of six (6) minutes while the plant is in full operation, the permittee shall visually inspect all individual stacks in emissions units EU01, EU02, and EU10 for visible emissions in accordance with EPA Method 22. The person conducting the survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If any visible emissions during the survey are identified from EU01, EU02, or EU10 the permittee shall perform one (1) of the following: [OAR 340-218-0050(3)(a)]
 - 14.a. Take corrective action to minimize the emissions; or
 - 14.b. Use Modified EPA Method 9 in accordance with EPA Method 203B within 24 hours on EU 10. Each Modified EPA Method 9 test must be a minimum of six (6) minutes long unless any one (1) reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 12 is documented, whichever period is shorter.
15. **Recordkeeping Requirement.** The permittee shall record all visible emissions monitoring (date, time, and type of observation-whether Modified EP Method 9 or EPA Method 22), visible emissions exceedances, and corrective actions taken in a log for monitoring pertaining to Condition 14. [OAR 340-218-0050(3)(a)]

Table 4. Emissions Unit EU03 Specific Emission Limits and Standards

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
EU03	32-010-(2),(3)	16	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	19
	33-065	21	PM	10.0 lbs/ton	Periodic VE Observations and Annual Compliance Testing	21.a, 22
	32-015(2)*	17	PM	0.1 gr/dscf	Periodic VE Observations	19
	32-045*	18	PM	Process Weight Limit: 32-045, Table 1	Periodic VE Observations, Equipment I&M and Material Throughput	19
	40 CFR 64.3(b)(3)(iii)	22	PM, PM ₁₀ , VOC, and CO	Surrogate Compliance Emissions Monitoring Parameter (SCEMP) plan	Monitoring and Recordkeeping	22.a -22.k

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
	40 CFR 241.3	23	Hog fuel	Biomass	NA	NA

*These rules/conditions apply during the alternative operating scenario in which the briquet dryers are heated by natural gas combustion in an auxiliary burner.

16. Applicable Requirement. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from EU03 for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water vapor. [LRAPA 32-010-(2),(3)]
17. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter from EU03 in excess of 0.1 grains per dry standard cubic foot. [LRAPA 32-015(2)]
18. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter in any one (1) hour from EU03 in excess of the amount shown in Table 1, LRAPA 32-045, for the process weight allocated to the process. [LRAPA 32-045]
19. Monitoring Requirement. In addition to the monitoring required by Condition 22, the permittee shall visually inspect the ACC and Dryer 1 Wet Exhaust from EU03 for visible emissions in accordance with EPA Method 22 *at least daily*, for a minimum of six (6) minutes while the plant is in full operation. The person conducting the survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If any visible emissions during the survey are identified from EU03, the permittee shall perform one of the following: [OAR 340-218-0050(3)(a) and 40 CFR Part 64 – CAM, applicable to the control device at EU03]
 - 19.a. Take corrective action to minimize the emissions; or
 - 19.b. Use Modified EPA Method 9 in accordance with the EPA Method 203B within 24 hours on the ACC and Dryer 1 Wet Exhaust from EU03. Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 16 is documented, whichever period is shorter.
20. Recordkeeping Requirement. The permittee shall record all visible emissions monitoring, visible emissions exceedances, and corrective actions taken in a log for monitoring pertaining to Condition 19. The permittee shall also record when the monitoring required by Condition 19 is performed during the alternative operating scenario. [OAR 340-218-0050(3)(a)]
21. Applicable Requirement. The permittee shall not cause or permit the emission of particulate matter (PM) from the charcoal producing plant sources including, but not limited to, charcoal furnaces (retorts), heat recovery boilers, after combustion chambers, and wood dryers using any portion of the charcoal furnace off-gases as a heat source, in excess of a total from all sources within the plant site of 10.0 pounds per ton of charcoal produced (as determined from the retort process) as an annual average. Emissions from char storage, briquette making (excluding dryers using furnace off-gases), boilers not using furnace off-gases, and fugitive sources are excluded in determining compliance with this emission limit. [LRAPA 33-065(1) and (2)]
 - 21.a. Testing Requirement. Between January 1, 2018 and December 31st, 2018, the permittee shall test EU03 at least once to determine the type, quantity, quality and duration of emissions, and process

parameters affecting emissions, in conformance with test methods on file with LRAPA. If this test exceeds the emission limitation of 10.0 pounds of PM per ton of charcoal produced on an annual average, then three (3) additional tests shall be required at 3-month intervals with all four (4) tests being averaged to determine compliance with the annual standard. No single test shall be greater than twice the annual average emission limitation. These source testing requirements shall remain in effect unless waived in writing by LRAPA upon adequate demonstration that the source is consistently operating at lowest practicable levels. [LRAPA 33-065(5)]

22. **Compliance Assurance Monitoring (CAM):** The permittee shall demonstrate compliance with the CAM for PM, PM₁₀, VOC, and CO, the EU03 charring and drying system by implementing the following Surrogate Compliance Emissions Monitoring Parameter (SCEMP) plan: [40 CFR 64.3 (b)(3)(iii)]

- 22.a. The permittee shall maintain an operating temperature of at least a 1400°F in the ACC on the retort furnace, except during startup, shutdown or maintenance. The ACC operating temperature shall be continuously monitored in the outlet of the ACC combustion chamber, and recorded automatically on a strip chart or data acquisition system. Corrective action shall be taken within 10 minutes if the ACC operating temperature falls below 1500°F, except during startup, shutdown or maintenance. Corrective actions include, but are not limited to, turning on auxiliary natural gas burners to provide additional heat.
- 22.b. The permittee shall maintain a record of the ACC operating temperatures, any ACC temperature excursions (i.e., noted hourly average temperatures that fall below 1500°F), and a log of corrective action for the monitoring described in Condition 22.a.
- 22.c. The permittee shall conduct inspections of the ACC to ensure proper operation of the oxidizer. These include, but are not limited to, ~~annual~~ periodic inspections of the burner assemblies, blowers, refractory lining, oxidizer shell, fuel lines, and ductwork.
- 22.d. The permittee shall continuously monitor the temperature in the retort furnace cyclones and maintain the temperature above 150°F during normal operations (not including periods of system startup, shutdown, or maintenance).
- 22.e. If the temperature falls below 150°F in one of the retort furnace cyclones during normal operations, the permittee shall investigate and take corrective actions to unplug the cyclone while the system continues to operate.
- 22.f. If the temperature falls below 150°F in both retort furnace cyclones during normal operations, the permittee shall investigate and take corrective actions to unplug both cyclones while the system continues to operate. If at least one of the cyclone's temperatures cannot be raised above 150°F, the retort furnace shall be shut down until the problem causing the low temperature is resolved.
- 22.g. The permittee shall record all temperature monitoring of the retort furnace cyclones, cyclone temperature excursions (i.e., temperature readings that are below 150°F), and corrective actions taken in a log for monitoring pertaining to Condition 22.c.
- 22.h. The permittee shall monitor the hogfuel dryer cyclone bin level indicator hourly. If a "High Level" is shown on the indicator, the permittee shall investigate and verify that a problem exists. In the event of a problem, the permittee shall take corrective actions to resolve the problem.
- 22.i. The permittee shall record all bin level monitoring of the hogfuel dryer cyclone, "High Level" indications, and corrective actions taken in a log for monitoring pertaining to Condition 22.h.
- 22.j. The permittee shall monitor the operation of the rotary valve at the discharge of the hogfuel dryer cyclone hourly. If the valve will not rotate properly, the permittee shall investigate and take corrective actions to ensure proper discharge of the cyclone.
- 22.k. The permittee shall record all monitoring of the hogfuel dryer cyclone, rotary valve problems, and corrective actions taken in a log for monitoring pertaining to Condition 22.i.

23. **EU03 Hog Fuel Limitations:** The permittee may only pyrolyze *biomass* in EU03 charring and drying system. This condition only applies to the biomass that is processed in the wood dryer and retort furnace. *Biomass* means any biomass-based solid fuel that is not a solid waste as defined in 40 CFR 241.3. This includes, but is not limited to:

- 23.a. Wood residue and wood products, including trees, tree stumps, tree limbs, bark, lumber, sawdust,

- sander dust, chips, scraps, slabs, millings and shavings;
- 23.b. Animal manure, including litter and other bedding materials;
- 23.c. Vegetative agricultural and silvicultural materials, including logging residues (slash), nut and grain hulls and chaff , bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds.

Table 5. Emissions Unit EU04 Specific Emission Limits and Standards

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
EU04	32-010-(2),(3)	24	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	27
	32-015(2)	17, 25	PM	0.1 gr/dscf	Periodic VE Observations	27
	32-045	26	PM	Process Weight Limit	Periodic VE Observations, Equipment I&M and Material Throughput	27

- 24. Applicable Requirement. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from EU04 for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water vapor. [LRAPA 32-010-(2),(3)]
- 25. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter from EU04 in excess of 0.1 grains per dry standard cubic foot. [LRAPA 32-015(2)]
 - 25.a. Testing Requirement. The permittee shall use the emission verification testing required by Condition 51 to verify that the grain loading limit of 0.1 gr/dscf is not being exceeded. [OAR 340-218-0050(3)(a)]
- 26. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter in any one (1) hour from EU04 in excess of the amount shown in Table 1, LRAPA 32-045, for the process weight allocated to the process. [LRAPA 32-045]
- 27. Monitoring Requirement. **At least monthly** for a minimum of 6 minutes while the plant is in full operation, the permittee shall visually inspect all individual stacks in emissions units EU04 for visible emissions in accordance with EPA Method 22. The person conducting the survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If any visible emissions during the survey are identified the permittee shall perform one of the following: [OAR 340-218-0050(3)(a)]
 - 27.a. Take corrective action to minimize the emissions; or
 - 27.b. Use Modified EPA Method 9 in accordance with EPA Method 203B within 24 hours on EU04. Each Modified EPA Method 9 test must be a minimum of six (6) minutes long unless any one (1) reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 24 is documented, whichever period is shorter.

27.c. Recordkeeping Requirement. The permittee shall record all visible emissions monitoring (date, time, and type of observation-whether Method 9 or 22), visible emissions exceedances, and corrective actions taken in a log for monitoring pertaining to Condition 27. [OAR 340-218-0050(3)(a)]

Table 6. Emissions Unit EU08 Specific Emission Limits and Standards

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
EU08	32-010(2),(3)	28	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	29
	32-015(2)	30	PM	0.1 gr/dscf	Periodic VE Observations	32
	32-045	31	PM	Process Weight Limit	Periodic VE Observations, Equipment I&M and Material Throughput	32

28. Applicable Requirement. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from EU08 for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water vapor. [LRAPA 32-010-(2),(3)]

29. Monitoring Requirement. *At least monthly*, for a minimum of six (6) minutes while the plant is in full operation, the permittee shall visually inspect all individual stacks in EU08 for visible emissions in accordance with EPA Method 22. The person conducting the survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If any visible emissions during the survey are identified from EU08, the permittee shall perform one of the following: [OAR 340-218-0050(3)(a)]

- 29.a. Take corrective action to minimize the emissions; or
- 29.b. Use Modified EPA Method 9 in accordance with the EPA Method 203B within 24 hours on EU 8. Each Modified EPA Method 9 test must be a minimum of six (6) minutes long unless any one (1) reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 28 is documented, whichever period is shorter.
- 29.c. Recordkeeping Requirement. The permittee shall record all visible emissions monitoring (date, time, and type of observation-whether Method 9 or 22), visible emissions exceedances, and corrective actions taken in a log for monitoring pertaining to Condition 29. [OAR 340-218-0050(3)(a)]

30. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter from EU08, in excess of 0.1 grains per dry standard cubic foot. [LRAPA 32-015(2)]

30.a. Testing Requirement. The permittee shall use the emission verification testing required by Condition 53 to verify that the grain loading limit of 0.1 gr/dscf is not being exceeded. [OAR 340-218-0050(3)(a)]

31. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter in any one (1) hour from EU08 in excess of the amount shown in Table 1, LRAPA 32-045, for the process weight

allocated to the process. [LRAPA 32-045]

32. **Monitoring Requirement (CAM - Compliance Assurance Monitoring).** In order to demonstrate continuous compliance with the PM grain loading and process weight limits in Conditions 30 and 31, the permittee shall operate the baghouses used to control PM emissions from EU08 such that the pressure drop across any baghouse is not less than 2.0 inches nor greater than 8.0 inches of water column, except for a period of 10 days after new filters are installed. For a period of 10 days after new filters are installed the permittee shall operate the baghouses used to control PM emissions from EU08 such that the pressure drop across any baghouse is not less than 0.0 inches or greater than 8.0 inches of water column. The permittee shall use the following compliance assurance methods: [OAR 340-218-0050(3)(a) and 40 CFR 64.3 (b)(3)(iii)]
- 32.a. **Once each day**, the permittee shall confirm that water is circulating through the wet scrubber.
 - 32.b. **Once each day**, the permittee shall monitor the pressure drop across the baghouses used to control PM emissions from EU08.
 - 32.c. **Once each quarter**, the permittee shall inspect the baghouses used to control PM emissions from EU 8 for wear, plugging, abrasion, and integrity of mechanical and ancillary systems.
 - 32.d. The permittee shall take corrective action to return to the highest reasonable efficiency and effectiveness, all air pollution control equipment and emission reduction processes that the regular inspections show to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parameter action levels. The exceedance of a parameter action level shall not itself be considered a violation of the emission limits in Conditions 30 and 31. [LRAPA 32-007]
 - 32.e. **Recordkeeping Requirement.** The permittee shall record all inspections, maintenance, parameter action level range exceedances, and corrective actions taken in a maintenance log for monitoring pertaining to Condition 32. [OAR 340-218-0050(3)(a)]

Table 7. Emissions Unit EU11 Specific Emission Limits and Standards

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
EU11	32-010-(2),(3)	31	Visible Emissions	20% opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	34
	32-015(2)	35	PM	0.1 gr/dscf	Periodic VE Observations	37
	32-045	36	PM	Process Weight Limit	Periodic VE Observations, Equipment I&M and Material Throughput	37
	32-008(2)	38	VOC	TACT	Periodic VE Observations	39
					Temperature	40, 22
					Flow Testing	41

33. **Applicable Requirement.** The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from EU11 Solvent Treated Briquet Operations for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water vapor. [LRAPA 32-010(2),(3)]
34. **Monitoring and Recordkeeping Requirements.** The permittee shall demonstrate compliance with Condition 31 by performing the compliance monitoring required by Conditions 19 and 29, and the recordkeeping

- required by Conditions 20 and 29.c. [OAR 340-218-0050(3)(a)]
35. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter from EU11 Solvent Treated Briquet Operations in excess of 0.1 grains per dry standard cubic foot. [LRAPA 32-015(2)] During solvent treated briquet operation, PM emissions generated by the handling and screening of dried briquets shall be controlled by the packaging dust collector (PCD 08-29C).
36. Applicable Requirement. The permittee shall not cause or allow the emission of particulate matter in any one (1) hour from EU11 Solvent Treated Briquet Operations in excess of the amount shown in Table 1, LRAPA 32-045, for the process weight allocated to the process. [LRAPA 32-045]
37. Monitoring and Recordkeeping Requirements. The permittee shall demonstrate compliance with Conditions 35 and 36 by performing the compliance monitoring and recordkeeping required by Conditions 32 and 32.e. [OAR 340-218-0050(3)(a)]
38. Applicable Requirement. The permittee shall operate EU11 Solvent Treated Briquet Operations according to the following procedures. [LRAPA 32-008(2)]
- 38.a. Solvent shall be transferred to the surge tank in the railcar unloading building only by submerged filling.
- 38.b. All solvent used during briquet treatment operation shall be cooled to below 50°F, as a daily average values, before being pumped into the dip tank.
- 38.c. Solvent shall be added to the dip tank only by submerged filling.
- 38.d. The permittee shall perform prescreening of briquets prior to solvent application in order to minimize the production of solvent-coated fines.
- 38.e. During solvent treated briquet operation, the permittee shall collect the solvent vapors generated in the briquet treatment area and shall exhaust the collected solvent vapors to the ACC serving the charcoal retort furnace. The collection of the solvent vapors shall satisfy the following enclosure requirements:
- 38.e.i. The total area of all natural draft openings shall not exceed 5% of the total surface area of the total enclosure's walls, floor, and ceiling.
- 38.e.ii. The air passing through all natural draft openings shall flow into the enclosure continuously.
- 38.f. The temperature within the combustion zone of the ACC shall be maintained at 1400°F and shall achieve at least 95% destruction of the VOC generated by the solvent treated briquet operation.
- 38.g. In the event that the ACC is not available, solvent vapors collected from the briquet treatment area may be discharged uncontrolled to the atmosphere. Uncontrolled atmospheric discharge of solvent vapors shall not exceed 8 hours in one (1) calendar day nor 280 hours in one (1) calendar year.
- 38.h. Solvent may be applied to briquets using the dip tank and/or a curtain coater system.
39. Monitoring Requirement. The permittee shall perform monthly visual inspections of solvent handling equipment and promptly repair any leaks that are found. [OAR 340-218-0050(3)(a)]
- 39.a. Recordkeeping Requirement. The permittee shall record all inspections and repairs pursuant to Condition 39. [OAR 340-218-0050(3)(a)]
40. Monitoring Requirement (CAM - Compliance Assurance Monitoring). In addition to the monitoring required by Condition 22, the permittee shall measure the temperature on the line to the EU11 Solvent Treated Briquet Operations dip tank once each day while the STB operation is in use. [OAR 340-218-0050(3)(a) and 40 CFR 64.3 (b)(3)(iii)]
- 40.a. Recordkeeping Requirement. For each month, the permittee shall calculate the daily average

temperature on the line to the STB dip tank. [OAR 340-218-0050(3)(a)]

41. Monitoring Requirement. Once during the permit term, the permittee shall performing the following: [OAR 340-218-0050(3)(a)]

- 41.a. Use a sampling method approved by LRAPA to measure the flow through each natural draft opening, and record whether the flow is outflow or inflow. Volumetric flow rates shall be calculated without the adjustment normally made for moisture content; and
- 41.b. Determine the average inward face velocity using the following equation:

$$FV = \{ \sum Q_o - \sum Q_i \} / \{ \sum A_t \}$$

where: FV* = average inward face velocity (ft/min);
 \sum = symbol representing “summation of”;
 $\sum Q_o$ = sum of the outflows (ft³/min);
 $\sum Q_i$ = sum of the inflows (ft³/min); and
 $\sum A_t$ = total face area of all natural draft openings, as determined through the methods in Condition 46.e.
 * A negative value for FV indicates overall inward flow.

- 41.c. Show that the average inward face velocity is greater than 500 feet per minute (9000 meters per hour); or
- 41.d. Perform continuous observation using smoke tubes, streamers, tracer gases, or other means approved by LRAPA over the period that the volumetric flow rate tests in Condition 41 are carried out.
- 41.e. Recordkeeping Requirement. The permittee shall record the results of the monitoring completed pursuant to Condition 41. [OAR 340-218-0050(3)(a)]

42. Applicable Requirement. The permittee shall maintain records of material stored in EU11 Solvent Treated Briquet Operations, which shall include a description of the material(s), dimensions of storage vessel(s), and capacity of storage vessel(s). [OAR 340-218-0050(3)(a)]

Table 8. Emission Limits and Standards That Apply To Insignificant Activities

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
32-010-(2) and (3)	43.a	Opacity	20%
32-030	43.b	PM/PM ₁₀ /PM _{2.5}	0.1 gr/dscf adjusted to 50% excess air or calculated to 12% CO ₂
32-015(2)	43.c	PM/PM ₁₀ /PM _{2.5}	0.1 gr/dscf
32-045	43.d	PM	Process Weight Limit
40 CFR Part 63, Subpart ZZZZ	45	HAPs	Work Practices for emergency-use generators

43. **Applicable Requirement:** LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions [LRAPA Title 12,

OAR 340-200-0020] exist at facilities required to obtain a LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:

- 43.a. 32-010(2), (3) (20% opacity)
 - 43.b. 32-030 (0.1 gr/dscf corrected to 12% CO₂ or 50% excess air for fuel burning equipment)
 - 43.c. 32-015(2) (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)
 - 43.d. 32-045 (process weight limit for non-fugitive, non-fuel burning equipment)
44. Testing, Monitoring, and Recordkeeping Requirements: Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in LRAPA Title 12 and perform the testing in accordance with the DEQ’s *Source Sampling Manual*.

Reciprocal Internal Combustion Engine (SI-RICE) NESHAP for Emergency Generators

45. For all existing stationary reciprocating internal combustion engines the permittee shall meet the requirements from 40 CFR Part 63 Subpart ZZZZ beginning October 19, 2013 including but not limited to the following. If the permittee does not operate each engine according to the requirements in 45.a through 47.c, the engine will not be considered an emergency engine under 40 CFR 63 Subpart ZZZZ and will need to meet all requirements for non-emergency engines. These conditions are applicable to both compression ignition (CI) and spark ignition (SI) engines: [40 CFR 63.6640]
- 45.a. There is no time limit on the use of emergency stationary RICE in emergency situations.
 - 45.b. The permittee may operate each emergency stationary RICE for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by Federal, State or local government, the manufacturer, the vendor, or the insurance company associated with the engine. Maintenance checks and readiness testing of such units is limited to 100 hours per year. The owner or operator may petition the Administrator for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that Federal, State, or local standards require maintenance and testing of emergency RICE beyond 100 hours per year.
 - 45.c. The permittee may operate each emergency stationary RICE up to 50 hours per year in non-emergency situations, but those 50 hours are counted towards the 100 hours per year provided for maintenance and testing. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another entity; except that owners and operators may operate the emergency engine for a maximum of 15 hours per year as part of a demand response program if the regional transmission organization or equivalent balancing authority and transmission operator has determined there are emergency conditions that could lead to a potential electrical blackout, such as unusually low frequency, equipment overload, capacity or energy deficiency, or unacceptable voltage level. The engine may not be operated for more than 30 minutes prior to the time when the emergency condition is expected to occur, and the engine operation must be terminated immediately after the facility is notified that the emergency condition is no longer imminent. The 15 hours per year of demand response operation are counted as part of the 50 hours of operation per year provided for non-emergency situations. The supply of emergency power to another entity or entities pursuant to financial arrangement is not limited by this condition as long as the power provided by the financial arrangement is limited to emergency power.

PLANT SITE EMISSION LIMITS

46. **Applicable Requirement:** The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040, 42-0041, 42-0043, 42-0045, formerly 34-060-4 and 34-060-5]

Table 9: PSELS

Pollutant	Plant Site Emission Limit (tons/year)	Unassigned Emissions (tons/year)
PM	284	14
PM ₁₀	204	4
PM _{2.5}	146	1
SO ₂	48	0
NO _x	323	0
CO	99	0
VOC	113	0
GHG (CO ₂ e)	74,000	0

- 46.a. The permittee may only use Unassigned Emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by LRAPA. [LRAPA 42-0045]

Plant Site Emission Limits Monitoring

47. PSEL Recordkeeping and Monitoring Requirements: [OAR 340-218-0050(3)]
- 47.a. *By the 15th of each month*, the permittee shall determine compliance with the Plant Site Emission Limits (PSELs) established in Condition 46 of this permit by conducting the monitoring in the following table. [OAR 340-218-0050(3)(a)]
 - 47.b. Emissions calculations must be performed each month for the preceding 12 consecutive calendar months.
 - 47.c. Compliance with PSELs must be determined using the calculations contained in Condition 46 using the monitored parameters recorded during the reporting period and the emission factors contained in the following table (Table 10 PSEL Process Monitoring and Emission Factors), unless the permittee elects to pay emission fees based on actual emissions using a verified emission factor determined in accordance with OAR 340-220-0170. If the permittee is paying on actual emissions based on a verified emission factor, the verified emission factor must be used for determining compliance with the PSEL in accordance with Condition 55.
 - 47.d. The emissions factors listed in Condition 47.c (Table 10) are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs must only be determined by the calculations contained in Condition 46.

Table 10. PSEL Process Monitoring and Emission Factors

Process	Emissions Unit ID	Pollutants	Process Parameter Monitored	Emission Factor (EF)	EF Verification Testing Condition	Monitoring and Record Keeping Condition
Wood Receipt and Storage	EU01	PM, PM ₁₀ , PM _{2.5}	Wood Throughput (dry tons)	PM = 0.10 lb/dry ton PM ₁₀ = 0.05 lb/dry ton PM _{2.5} = 0.01 lb/dry ton	Not Required	46
Hogfuel Sizing & Infeed System	EU02	PM, PM ₁₀ , PM _{2.5}	Actual Hours of Operation for Screener In, Screener Out, Secondary Screen In, Secondary Screen Out, and Reject Diverter (hr-opr)	Section	Not Required	46
				Screener In: PM = 0.096 lb/hr-opr PM ₁₀ = 0.048 lb/hr-opr PM _{2.5} = 0.003 lb/hr-opr		
				Screener Out: PM = 0.0192 lb/hr-opr PM ₁₀ = 0.01 lb/hr-opr PM _{2.5} = 0.001 lb/hr-opr		
				Secondary Screen In: PM = 0.0192 lb/hr-opr PM ₁₀ = 0.01 lb/hr-opr PM _{2.5} = 0.001 lb/hr-opr		
				Secondary Screen Out: PM = 0.0048 lb/hr-opr PM ₁₀ = 0.002 lb/hr-opr PM _{2.5} = 0.0002 lb/hr-opr		
Reject Diverter: PM = 0.0192 lb/hr-opr PM ₁₀ = 0.01 lb/hr-opr PM _{2.5} = 0.001 lb/hr-opr						
Charring and Drying System	EU03	PM, PM ₁₀ , PM _{2.5}	Char Production (tons)	PM = 7.42 lb/ton PM ₁₀ = 6.80 lb/ton PM _{2.5} = 5.03 lb/ton	51	46
		VOC, NOx, SO ₂ , CO	Char Production (tons)	VOC = 1.0 lb/ton NOx = 13.0 lb/ton SO ₂ = 2.0 lb/ton CO = 2.9 lb/ton	52	46
Alternative Operating Scenario (briquet)	EU03-1	PM, PM ₁₀ , PM _{2.5}	Briquet Production (tons)	PM = 0.5 lb/ton PM ₁₀ = 0.3 lb/ton PM _{2.5} = 0.21 lb/ton	51	46

Process	Emissions Unit ID	Pollutants	Process Parameter Monitored	Emission Factor (EF)	EF Verification Testing Condition	Monitoring and Record Keeping Condition
drying)		VOC, NOx, SO ₂ , CO	Actual Hours of Operation Under Alternative Operating Scenario (hr-opr)	VOC = 0.275 lb/hr-opr NOx = 5.0 lb/hr-opr SO ₂ = 0.03 lb/hr-opr CO = 4.2 lb/ hr-opr	Not Required	46
Alternative Operating Scenario (ACC startup burners)	EU03-2	PM, PM ₁₀ , PM _{2.5} , VOC, NOx, SO ₂ , CO	Actual Hours of Operation Under Alternative Operating Scenario (hr-opr)	PM/PM10/PM2.5 = 0.522 lb/hr-opr VOC = 0.377 lb/hr-opr NOx = 6.34 lb/hr-opr SO ₂ = 0.041 lb/hr-opr CO = 4.83 lb/hr-opr	Not Required	47
Briquet Cooling	EU04	PM, PM ₁₀ , PM _{2.5}	Briquet Production (tons)	PM = 1.10 lb/ton PM ₁₀ = 0.30 lb/ton PM _{2.5} = 0.15 lb/ton	53	46
Briquet Handling System	EU08	PM/PM ₁₀ /PM _{2.5}	Actual Hours of Operation (hr-opr)	2.63 lb/hr-opr	53	46
Combustion Unit	EU10	NOx, CO, VOC	Natural Gas Combustion and Actual Hours of Operation (MMSCF and hr-opr)	NOx = 0.335 lb/hr-opr CO = 0.281 lb/hr-opr VOC = 0.0184 lb/hr-opr	Not Required	46
Solvent Treated Briquet (STB) Operations	EU11	VOC	Amount of STB Produced (When ACC is Working and Not Working) (ton STB)	<u>Solvent Application:</u> 2.82 lb/ton STB (when ACC <i>not</i> working) 0.141 lb/ton STB (when ACC working) <u>Solvent Handling:</u> 1.31 tons/year (“fixed” storage tank and equipment losses) <u>Fines System:</u> 2.02 lb/ton STB	Not Required	46

48. The permittee shall determine compliance with the PSEs, except GHGs, by calculating emissions for each emissions unit using the following formula, process parameters measured in Condition 47.c, and the emission factors listed in Condition 47.c:

$$E = \sum P_{eu} \times EF_{eu} \times K$$

where; E = pollutant emissions in tons/year
 \sum = symbol representing “summation of”
 P_{eu} = process parameter for each emissions unit identified in Condition 47.c.
 EF_{eu} = emission factor identified for each emissions unit and pollutant in Condition 47.c.
 K = conversion constant = 1 ton/2000 lbs for annual emissions calculations

EMISSION FEES

49. Emission fees will be based on the Plant Site Emissions Limits, unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. If the permittee reports actual emissions for one or more permitted processes/pollutants, the permitted emissions for the remaining permitted processes/pollutants will be based on the following table: [OAR 340-220-0090]

Emission Source Description	PM ₁₀ (tons)	SO ₂ (tons)	NO _x (tons)	VOC (tons)
EU01 Wood Receipt and Storage	3.8	--	--	--
EU02 Hogfuel Sizing and Infeed System	0.3	--	--	--
EU03 Charring and Drying	165	48	314	24
EU03 ACC Burners	0.7		7.9	0.5
EU04 Briquet Cooling	23	--	--	--
EU08 Briquet Handling	11	--	--	--
EU10 Combustion Unit	0.1	--	1.4	0.1
EU11 Solvent Treated Briquet (STB) Operation	--	--	--	88
EU-AIA Aggregate Insignificant Activity	1	--	--	--

GENERAL TESTING REQUIREMENTS [OAR 340-218-0050(3)(A)]

50. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ’s *Source Sampling Manual*. [LRAPA 35-0120]
- 50.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the *Source Sampling Manual* and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
- 50.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the

- tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
- 50.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
- 50.c.i. at least 90% of the design capacity for new or modified equipment;
 - 50.c.ii. at least 90% of the maximum operating rate for existing equipment; or
 - 50.c.iii. at 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
- 50.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 50.e. Source test reports prepared in accordance with the DEQ's *Source Sampling Manual* must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

Emission Factor Verification Testing

51. Once during the permit term **by no later than December 31, 2015**, the permittee shall conduct testing to verify the emission factors used to demonstrate compliance with the PM and PM₁₀ PSELs for the EU03 charring and drying system. Compliance with the briquet dryer PM and PM₁₀ emissions limits during the alternative operating scenario will be presumed based on the use of natural gas in the auxiliary burner and based on the use of good operating and maintenance practices for the burner. Visible emissions monitoring using Modified EPA Method 9 shall be conducted during the testing.
52. Once during the permit term **by no later than December 31, 2015**, the permittee shall conduct testing to verify the emission factors used to demonstrate compliance with the VOC, NO_x, SO₂, and CO PSELs for the EU03 charring and drying system.
53. Once during the duration the permit term **by no later than December 31, 2015**, the permittee shall conduct testing to verify the emission factors used to demonstrate compliance with the PM and PM₁₀ PSELs for the EU04 briquet cooling and EU08 briquet handling systems. Visible emissions monitoring using Modified EPA Method 9 shall be conducted during the testing.
- 53.a. The testing shall be performed on the briquette cooler exhausts (4 total).
 - 53.b. During the testing the permittee shall measure and record the monitoring parameters required by Conditions 29 and 32.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Monitoring Requirements:

54. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
55. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0050(3)(a)(F)]

56. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

General Recordkeeping Requirements

57. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
- 57.a. the date, place as defined in the permit, and time of sampling or measurements;
 - 57.b. the date(s) analyses were performed;
 - 57.c. the company or entity that performed the analyses;
 - 57.d. the analytical techniques or methods used;
 - 57.e. the results of such analyses;
 - 57.f. the operating conditions as existing at the time of sampling or measurement; and
 - 57.g. the records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
58. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [LRAPA 34-015, 35-0160, and OAR 340-218-0050(3)(b)]
59. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
60. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [OAR 340-218-0050(b)(B)]

REPORTING REQUIREMENTS

General Reporting Requirements

61. Excess Emissions Reporting The permittee must report all excess emissions as follows: [LRAPA Title 36]
- 61.a. Immediately (within 1 hour of the event) notify LRAPA of an excess emission event by phone, e-mail, or facsimile; and
 - 61.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025(1)]
 - 61.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
 - 61.b.ii. The date and time the owner or operator notified LRAPA of the event;
 - 61.b.iii. The equipment involved;

- 61.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - 61.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - 61.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
 - 61.b.vii. The final resolution of the cause of the excess emissions; and
 - 61.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to LRAPA 36-040.
- 61.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Accident Response System (OARs). The current number is 1-800-452-0311.
- 61.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
- 61.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.
- 61.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
62. Permit Deviations Reporting: The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with Condition 61. [OAR 340-218-0050(3)(c)(B)]
63. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5);[OAR 340-218-0050(3)(c)(D)]
64. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

LRAPA
1010 Main Street
Springfield, OR 97477

Part 70 Operating Permit Program
U.S. EPA Region 10
Mail Stop: OAW-150
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Semi-annual and Annual Reports

65. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by LRAPA. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the LRAPA office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]]
- 65.a. The first semi-annual report is due on August 15th and must include the semi-annual compliance certification; [OAR 340-218-0080]
- 65.b. The annual report is due on March 1st and must consist of the following:
- 65.b.i. The emission fee report; [OAR 340-220-0100]
 - 65.b.ii. A summary of the excess emissions upset log; [LRAPA 36-025]
 - 65.b.iii. The second semi-annual compliance certification; and [OAR 340-218-0080]
 - 65.b.iv. The annual report shall also include annual greenhouse gas (GHG) emissions in accordance with OAR 340 Division 215. [OAR 340-215-0010(2) and 340-215-0040]
66. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
- 66.a. The identification of each term or condition of the permit that is the basis of the certification;
- 66.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
- 66.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in condition 66.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12, occurred;
- 66.d. Such other facts as LRAPA may require to determine the compliance status of the source;
- 66.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications; and [OAR 340-218-0080(6)(e)]
- 66.f. Number of CAM excursions and corrective action.

NON-APPLICABLE REQUIREMENTS [OAR 340-218-0050(3)(c)]

67. The following State and Federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110]

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	The EU10 boiler is rated at less than 10 MMBtu/hr heat input.
40 CFR Part 63, Subpart DDDDD ('5D')	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	These standards have been stayed by EPA, but they would not apply because Kingsford is not, and does not have the potential to be a major source of HAP emissions.
63.11196(a)(1), (b), (c), (d); 63.11201(a), (b), (d); 63.11205(b) and (c); 63.11210 (a), (b), (d), (e); 63.11211, 63.11212, 63.11213, 63.11214(a), (d); 63.11220; 63.11221; 63.11222; 63.11223(c); 63.11224, 63.11225(a)(3) and (5), (c)(3), (6), (7), (e); 63.11226	40 CFR Part 63, Subpart JJJJJ Area Source Requirements for Boilers that are Subject to Emission Limits and Operating Limits.	The boiler at the Kingsford facility is not subject to the area source boiler NESHAP because: the natural gas-fired boiler in EU10 is exempt based upon that fuel, and the EU03 ACC, wood dryer retort furnace and briquet dryers are not classified as boilers or process heaters because they are not indirectly heated and because the combustion gases come into contact with process materials.
40 CFR Part 60 Subpart CCCC and DDDD	Standards of Performance for Commercial and Industrial Solid Waste Incineration Units	The standard is not applicable because units burning only wood feedstock for the production of charcoal are defined as a "chemical recovery units" in the rule and not incinerators, waste-burning kilns, ERUs or small remote incinerators under subparts CCCC or DDDD.
40 CFR Part 63, Subpart VVVVVV ('6V')	National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Manufacturing	The standard is not applicable because the lead (Pb) content of raw materials, products and by-products processed at the plant are all well below 0.1 percent, by weight.
40 CFR Part 51 and OAR 340 division 223 - BART	Best Available Retrofit Technology (BART) requirements under the Regional Haze program do not apply	BART does not apply because visibility impacts associated with "BART-eligible" devices at Kingsford were determined to be below the significance level.

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

G2. Reference Materials

Where referenced in this permit, the version of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. Source Sampling Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the LRAPA Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee shall comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 49-040] This condition is enforceable only by LRAPA.

G6. Credible Evidence

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [LRAPA 34-017]

G7. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(d), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit shall contain certification by a responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee shall promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G8. Open Burning [LRAPA Title 47]

The permittee is prohibited from conducting open burning, except as may be allowed by LRAPA 47-001 through 47-030.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0200 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee shall comply with OAR 340-248-0200 through 340-248-0280, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. such applicable requirements are included and are specifically identified in the permit, or
 - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit shall alter or affect the following:
 - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. the applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or
 - iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).

- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Lane Regional Air Protection Agency, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where a Title V operating permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or LRAPA rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee shall pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under Section 112(r) of the Federal Clean Air Act. The permittee shall submit payment to Lane Regional Air Protection Agency, 1010 Main Street, Springfield, Oregon, 97477, within 30 days of the date LRAPA mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes shall be submitted in writing to LRAPA. Payment shall be made regardless of the dispute. User-based fees shall be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee shall monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and
 - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in LRAPA Title 12.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), shall be submitted to LRAPA and the EPA.

- c. The permittee shall keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 shall not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee shall monitor for, and record, any Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
 - i. Violate an applicable requirement;
 - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. Be a Title I modification.
- b. A minimum 7-day advance notification shall be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G11 shall not extend to Section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit shall be requested and granted in accordance with OAR 340-218-0150. The permittee shall promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. Sale or exchange of the activity or facility.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee shall submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee shall submit an application for a significant permit modification in accordance with OAR 340-218-0180.

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source of air pollution control equipment in accordance with LRAPA 34-010 and 34-034 through 34-038.

G21. New Source Review Modification [LRAPA Title 38]

No permittee shall construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010) and having satisfied the requirements of LRAPA Title 38.

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

The permittee must furnish to LRAPA, within a reasonable time, any information that LRAPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to LRAPA copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to LRAPA along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-020]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
- b. A permit shall be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

G25. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit shall expire at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal shall be submitted at least 12 months before the expiration of this permit, unless LRAPA requests an earlier submittal. If more than 12 months is required to process a permit renewal application, LRAPA must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit shall remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G28. Property Rights [340-218-0050(6)(d)]

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

G29. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

The permittee shall have available at the facility at all times a copy of the LRAPA Title V Operating Permit and shall provide a copy of the permit to LRAPA or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056